

Magistrate Judge James P. Donohue

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

GERALD LESAN,

Defendant.

NO. 2:15-mj-00538-JPD

TO: The Clerk of the United States District Court at Western Washington
AND TO: The Assistant United States Attorney

YOU AND EACH OF YOU ARE HEREBY NOTIFIED that John
R. Crowley hereby appears in the above-entitled cause as the attorney for the
defendant. All further papers and pleadings herein, except original process,
should be served upon the undersigned attorney at the address below stated.

NOTICE OF APPEARANCE- 1

The Crowley Law Firm, P.L.L.C.

Grand Central Building
216 First Avenue S., Suite 204
Seattle, Washington 98104
Tel (206) 625-7500 ♦ Fax (206) 625-1223

1 YOU ARE HEREBY REQUESTED to provide discovery of the
2 following materials, as provided for by Fed. Rules Crim. Procedure:

3 1. The names and addresses of persons whom the prosecuting attorney
4 intends to call as witnesses at the hearing trial, together with any written or
5 recorded statement and the substance of any oral statements of witnesses.

6 2. Any written or recorded statements and the substance of any oral
7 statements made by the defendant.

8 3. Any reports of statements of experts made in connection with this
9 case, including results of physical or mental examinations and scientific tests,
10 experiments, or comparisons.

11 4. Any books, papers, documents, photographs, or tangible objects
12 which the prosecuting attorney intends to use for the hearing or trial or which
13 were obtained from or belonged to the defendant.

14 5. Any record of prior criminal convictions, known to the prosecuting
15 attorney, of the defendant and of persons to whom the prosecuting attorney
16 intends to call witnesses at the hearing or trial.

17 6. Any and all exculpatory information pursuant to Brady v. Maryland

18 7. The defendant further demands a “Speedy Trial”.

19 8. The defendant further demands timely notification of the state’s
20 intent to use any child hearsay statements at trial.

21 DATED this 25th day of November, 2015.

22 /s/ John R. Crowley
23 John R. Crowley, ESQ.,
 WSBA# 19868
 Counsel for Mr. Lesan

NOTICE OF ELECTRONIC SERVICE

I hereby certify that on November 25, 2015 I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following: Clerk of the United States District Court and Assistant United States Attorney, Western District of Washington. On this same date, a copy of the attached document was mailed to the defendant in the above-captioned cause at.

/s/ Jessica Giles
Jessica Giles, Paralegal
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